
**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
DALLAS DIVISION**

Hiram Patterson, Texas Division,	§	
Sons of Confederate Veterans, Inc.,	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
Mike Rawlings,	§	
In His Official Capacity as	§	
Mayor of the City of Dallas, and	§	
Scott Griggs, Adam Medrano,	§	Civil Action No. 3:17-CV-02361-D
Casey Thomas, II, Dwaine Caraway,	§	
Rickey Callahan, Omar Narvaez,	§	
Keven Felder, Tennell Atkins,	§	
Mark Clayton, Adam McGough,	§	
Lee Kleinman, Sandy Greyson,	§	
Jennifer Gates, Philip Kingston,	§	
In Their Official Capacities as	§	
Members of the Dallas	§	
City Council,	§	
Defendants.	§	

PLAINTIFFS' MOTION FOR SANCTIONS

1. Plaintiffs move for an order to find defendants and defendants' attorneys in contempt, to strike defendants' unauthorized responsive brief and surreply, and to award attorney's fees against defendants and defendants' attorneys

2. The grounds for this motion are that defendants and defendants' attorneys filed two pleadings in violation of the Court's Scheduling Order,

which has caused plaintiffs unreasonable and unnecessary legal costs and impugned the authority of the Court to regulate Its docket efficiently.

3. This motion is based on the pleadings on file in this case and the attached memorandum. Additional evidence is provided in this memorandum's Exhibit A.

4. In light of the unusual circumstances of this case, plaintiffs respectfully submit that the Court may wish to issue an order to show cause why defendants and defendants' attorneys should not:

- a. Be found in contempt of court;
- b. Have Defendants' two unauthorized pleadings, ECF Nos. 21 & 28, stricken; and,
- c. Award Plaintiffs reasonable attorney's fees incurred to defend against the unauthorized pleadings.

Respectfully submitted this November 8, 2017.

By: /s/ KIRK DAVID LYONS
Texas Bar No. 12743500
P.O. Box 1235
Black Mountain, N.C. 28711
E-mail kdl@slrc-csa.org
Tel. (828) 669-5189
Fax (828) 575-5290

/s/ David D. Vandenberg
Mo. Bar No. 69873
3603D Las Colinas Drive
Austin, Texas 78731
E-mail davidvandenberg@hotmail.com
Tel. (512) 373-8694

CERTIFICATE OF SERVICE

I certify that on November 8, 2017, a copy of Plaintiffs' Motion for Sanctions was electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following attorney in charge for defendants, Mike Rawlings, et al.

Charles S. Estee
Office of the City Attorney
1500 Marilla Street
Dallas, Texas 75201
Tel. (214) 670-3519
charles.estee@dallascityhall.com

/s/ David D. Vandenberg

CERTIFICATE OF CONFERENCE

On 31 OCT 2017, I conferred with Stacy Rodriguez, attorney for defendants, and she states that she is opposed to Plaintiffs' Motion for Sanctions, because it lacks merit.

/s/ David D. Vandenberg

Attorney for Plaintiffs